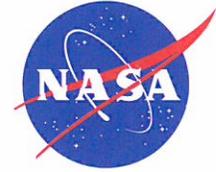


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 11, 2016

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at Events Related to the Space Forum  
Space Symposium Conferences, April 11-14, 2016

Representatives from NASA have been invited to attend a series of events held adjacent to the Space General Fusion Forum and the 32<sup>nd</sup> Space Symposium. The following are events that NASA employees are attending:

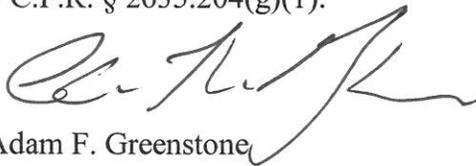
1. Economic Development and International Trade Luncheon, April 12, 2016: The State of Colorado, Office of Economic Development and International Trade, together with Colorado Space Business Roundtable, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, are holding a luncheon at 12:15 p.m. at the Broadmoor Hotel in Colorado Springs, CO. Approximately 15 people have been invited, including Colorado business leaders, state employees, academia, personnel from federal agencies, and representatives from industry. The approximate cost per person is \$25.00.

2. Blue Origin Reception, April 12, 2016: The Blue Origin is holding a reception at 4:30 p.m. at the Broadmoor in Colorado Springs, CO. Approximately 100 people have been invited, including representatives from other U.S. Government agencies and members from the Aerospace industry. The approximate cost per person is \$15.00.

I find that these events meet the requirements of a widely attended gathering as defined in 5 C.F.R. § 2635.204(g). I find that there is an Agency interest in having NASA personnel attend. NASA employees whose duties do not substantially affect the sponsors may accept an invitation for free attendance at these events for themselves. NASA employees, whose duties may substantially affect these co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their ethics counselor.

However, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009, requires signing an ethics pledge may accept free attendance at the Economic Development and International Trade Luncheon, but may only attend the Blue Origin Reception if they reimburse the sponsors the cost of the reception.

The events at which the NASA Administrator or the Deputy Administrator are giving a keynote address, they may accept free attendance for themselves and their invited guest under 5 C.F.R. § 2635.204(g)(1).

A handwritten signature in black ink, appearing to read 'A. F. Greenstone', written in a cursive style.

Adam F. Greenstone